

Federal Defenders  
OF NEW YORK, INC.Tamara Giwa  
Executive DirectorSouthern District  
81 Main Street, Suite 300  
White Plains, NY 10007  
Tel: (914) 428-7124 Fax: (914) 948-5109Jennifer L. Brown  
Attorney-in-Charge

June 27, 2024

## BY ECF &amp; E-MAIL

The Honorable Nelson S. Román  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 06/28/2024Re: *United States v. Turhan Jessamy*, 24-cr-61 (NSR) and 24-cr-86-01 (NSR)

Dear Honorable Judge Román:

I am writing to request additional time for the filing of defense motions. Under the current schedule, any defense motions are due on Tuesday, July 2, 2024. I am requesting that the entire schedule be moved out by three weeks such that defense motions would be due July 23, 2024, the government's opposition would be due August 20, 2024, and any reply would be due by September 3, 2024.

I am anticipating a motion pursuant *New York State Rifle & Pistol Association, Inc. v. Bruen*, 597 U.S. 1 (2022). At the end of last week, the United States Supreme Court provided guidance on this issue in its opinion in *United States v. Rahimi*, No. 22-915. I require additional time to review this decision and the impact it may have on my motion. Therefore, I am requesting three additional weeks to consider and possibly write on this issue. I have consulted with Assistant United States Attorney Ben Arad, who does not object to this request. Should the Court grant my request and adjourn the next conference date, which is scheduled for October 2, 2024, at 11:15 a.m., I would not object to the continued exclusion of time under the Speedy Trial Act.

Thank you for your time and consideration.

Sincerely,

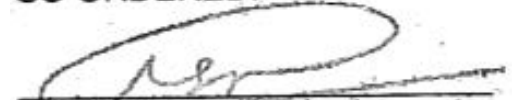

Elizabeth K. Quinn  
Counsel for Turhan Jessamy

cc: Ben Arad, A.U.S.A.

Deft's request for an extension of the briefing schedule is GRANTED, without objection by the Gov't, as follows: moving papers shall be filed July 23, 2024; the Gov't's opposition papers shall be filed Aug. 20, 2024; and Deft's reply papers, if any, shall be filed Sept. 3, 2024. The Status Conf. is adjourned from Oct. 2, 2024 to Oct. 30, 2024 at 12 Noon. The Gov't is directed to submit a proposed order excluding speedy trial time. Clerk of Court is requested to terminate the motion at ECF No. 14.

Dated: June 28, 2024

SO ORDERED:

  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE